

January 29, 2007

**Comments on FGCC 04-186; Unlicensed Operation on Vacant Television Channels**

I am the owner of KMCE, Inc., licensee of LPTV station KMCE in Monterey, California. I am also a Broadcast Engineer with over forty years of experience, and have considerable experience in the area of LPTV and Television Translator stations.

KMCE is located in the mountainous terrain of coastal California. The station is programmed in Spanish for this heavily Hispanic area. Our viewers are less likely to be CATV subscribers than Anglo viewers, and depend upon over-the-air television reception, many of whom utilize rod or "rabbit ear" antennas. Many of these television sets are located in high-density housing areas.

I believe it will be nearly impossible to accurately predict the area where any television station will provide a useful signal. Longley-Rice prediction models can only provide an approximation of an area where reception of over-the-air signals need protection from unlicensed services. There will be areas in our coverage where viewers will find our signal and watch it, although it will be predicted to not exist. These viewers deserve interference-free television viewing.

Calculated coverage areas must be supplemented by signal sensing capability in the proposed unlicensed transmitter(s). In our mountainous terrain, the "Hidden Node" problem places significant limitations on signal sensing. If signal sensing is to be successfully implemented, the sensing technique must be networked among the receivers to truly determine if an area is indeed a "white area" and therefore an area where unlicensed transmitter operation is permissible and will not cause interference to television receivers, both analog and digital. In this scheme, an unlicensed station will alert other stations on the network of a useful television signal existing on a channel under consideration for operation.

I urge the FCC to proceed with the utmost caution as the rules for unlicensed operation in the traditional television spectrum are considered. If rules for this new proposed operation are adopted that permit interference to existing services, it will be next to impossible to remedy later. Enforcement and correction of these problems will be hard to mandate after the fact.

Respectively submitted,

Martin J. Jackson  
President  
KMCE, Inc.